

MURPHY ORLANDO LLC
Attorneys at Law

494 BROAD STREET • 5TH FLOOR • NEWARK, NJ 07102

tel 201.451.5000 • fax 201.451.5000

WWW.MURPHYORLANDO.COM

molwig@murphyorlando.com

MALLORY B. OLWIG
ASSOCIATE

June 6, 2025

Via CM/ECF

Hon. Cathy L. Waldor, U.S.M.J.
Dr. Martin Luther King Justice Building
470 Dr. Martin Luther King Jr. Blvd.
Newark, NJ 07102

Re: Christopher Curtis Bellinger III v. The City of Perth Amboy, et al.
Docket No.: 24-CV-8442-JKS-CLW

Dear Your Honor:

This firm represents all named Defendants in this civil action. We write today **with Plaintiff's consent** to request an extension of the current discovery deadlines. On April 16, 2025, Your Honor entered a First Amended Pretrial Scheduling Order setting, among other deadlines, April 18, 2025, as the deadline for paper discovery responses, May 1, 2025, as the deadline for motions to amend pleadings or add new parties, and September 12, 2025, as the fact discovery deadline. [Dkt. 42 at ¶¶ 1-5].

In mid-April, this firm learned that the underlying criminal matter against the individual arrested with Plaintiff, was dismissed and expunged. As a result, Defendants were unable to respond to certain interrogatories or produce certain materials responsive to Plaintiff's request for production, including documents and body-worn camera footage. Because redacting these materials would be particularly costly and time-consuming, the parties agreed not to exchange discovery while Plaintiff sought affidavits from the individual and his attorney. Plaintiff obtained said affidavits and, on May 29, 2025, submitted a motion for a Consent Order permitting the release and use of information contained in the sealed and expunged records [Dkt. 48]. Your Honor granted this Order on May 30, 2025. [Dkt. 49].

Given this unanticipated delay, we write today to request a sixty (60) day extension to the current discovery deadlines. Both parties **consent** to the following schedule:

Fact Discovery	November 11, 2025
Motions to Add New Parties	June 30, 2025
Motions to Amend Pleadings	June 30, 2025
Interrogatories	June 17, 2025
Document Requests	June 17, 2025
Affirmative Expert Reports	November 14, 2025
Responsive Expert Reports	December 14, 2025
Expert Depositions	January 16, 2026

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If this request meets Your Honor's approval, please "so order" it below and have it entered on the docket or contact me and we will submit a proposed form of Order for the Court's use. Thank you very much for your attention and courtesies.

Respectfully submitted,
MURPHY ORLANDO LLC

/s/ *Mallory B. Olwig*
Mallory B. Olwig, Esq.

c: All Counsel of Record (via CM/ECF)

SO ORDERED. The deadlines in paragraphs 1, 2, 3, 4, 5, and 10 of the Court's Pretrial Scheduling Order are hereby extended as set forth above.

Hon. Cathy L. Waldor, U.S.M.J.